

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

MARK S. CARTER)	
)	
COMPLAINANT)	
)	
V.)	CASE NO.
)	2015-00184
)	
PEOPLES GAS KY LLC.)	
)	
DEFENDANT)	

COMMISSION STAFF'S INITIAL REQUEST FOR
INFORMATION TO MARK S. CARTER

Mark S. Carter ("Complainant"), pursuant to 807 KAR 5:001, is to file with the Commission the original and ten copies of the following information, with a copy to all parties of record. The information requested herein is due no later than November 17, 2015. Responses to requests for information shall be appropriately bound, tabbed and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Complainant shall make timely amendment to any prior response if he obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Complainant fails or refuses to furnish all or part of the requested information, he shall provide a written explanation of the specific grounds for his failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a document containing personal information, Complainant shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the document so that personal information cannot be read.

1. Refer to Peoples Gas, KY, LLC's ("Peoples") response to Commission Staff's First Request for Information ("Staff's First Request"), Item 3, which states in part that "[a]pplications were made by Peoples to request service at 1376 Taylor Fork, Turkey Creek, KY on June 18, 2014, on behalf of Mark Carter and on December 26, 201[4] on behalf of Debra Carter. Both applications were denied by EQT." Does Complainant agree with the assertions made in this statement? If not, state any differences.

2. Refer to Peoples' response to Staff's First Request, Item 1, which states:

Peoples submitted an application to EQT, on behalf of the complainant, seeking approval for a tap on well line WL-127411. The application was denied for the reason that system constraints would adversely affect EQT's operations. Subsequent to receiving this data request, Peoples and EQT

have further discussed the tap application and EQT has approved the application, effective 9/24/2015.

Since the filing of this complaint, has the Complainant received written notification that natural gas service would be made available? If so, provide any documentation received.

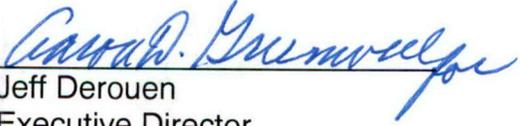
3. Has a customer line, including all equipment and material required to transfer natural gas from the tap on the gathering line to the Complainant's premises, been installed? If so, provide the name and address of the contractor who did the installation.

4. Did Peoples, or any other entity, furnish the Complainant with construction drawings specifying the installation methods and the materials approved by Commission prior to service installation? If so, provide the documentation received.

5. Does the Complainant currently have natural gas service? If so, when did service begin?

6. Was the Complainant charged a service tap fee? If so, provide all documentation showing the amount of the fee and what the fee included.

7. Has the Complainant entered into any written contract or agreement with Peoples, or with any other entity, regarding the terms of the Complainant's natural gas service? If so, provide any such documentation.


Jeff Derouen
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED OCT 30 2015

cc: Parties of Record

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